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**FILED**  
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District Court

**DEC 12 2007**

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

7 Attorneys for United States of America

8 UNITED STATES DISTRICT COURT

9 NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,  
11 Plaintiff,

12 v.

13 LI, ZONG GUO,

14  
15 Defendant.  
16

Criminal Case No. **07 - 00029**

**COMPLAINT**

17  
18 THE UNDERSIGNED COMPLAINANT CHARGES UPON INFORMATION AND BELIEF  
19 THAT:

20 **COUNT ONE**

21 **CONSPIRACY TO DISTRIBUTE METHAMPHETAMINE HYDROCHLORIDE**

22 Beginning on or about May 8, 2007, up to and including November 7, 2007, in the District of  
23 the Commonwealth of the Northern Mariana Islands, LI, ZONG GUO, the defendant, did knowingly  
24 and intentionally combine, conspire, confederate and agree with others known and unknown to  
25 distribute methamphetamine hydrochloride (commonly known as "ice"), a schedule II controlled  
26 substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).  
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**COUNT TWO**

**DISTRIBUTION AND POSSESSION WITH INTENT  
TO DISTRIBUTE METHAMPHETAMINE HYDROCHLORIDE**

On or about October 25, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, unlawfully, willfully and knowingly, distributed and possessed with intent to distribute a schedule II controlled substance, to wit, approximately 0.8 grams of methamphetamine hydrochloride (commonly known as "ice"), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT THREE**

**DISTRIBUTION AND POSSESSION WITH INTENT  
TO DISTRIBUTE METHAMPHETAMINE HYDROCHLORIDE**

On or about October 26, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, unlawfully, willfully and knowingly, distributed and possessed with intent to distribute a schedule II controlled substance, to wit, approximately 0.9 grams of methamphetamine hydrochloride (commonly known as "ice"), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT FOUR**

**DISTRIBUTION OF A CONTROLLED SUBSTANCE NEAR A SCHOOL**

On or about October 26, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, did knowingly and intentionally distribute a controlled substance within 1,000 feet of a school, to wit, approximately 0.9 grams of methamphetamine hydrochloride (commonly known as "ice"), near a high school located in Koblerville, Saipan, in violation of Title 21, United States Code, Section 860(a).

**COUNT FIVE**

**DISTRIBUTION AND POSSESSION WITH INTENT  
TO DISTRIBUTE METHAMPHETAMINE HYDROCHLORIDE**

On or about October 30, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, unlawfully, willfully and knowingly, distributed and possessed with intent to distribute a schedule II controlled substance, to wit, approximately 0.9 grams of methamphetamine hydrochloride (commonly known as "ice"), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT SIX**

**DISTRIBUTION OF A CONTROLLED SUBSTANCE NEAR A SCHOOL**

On or about October 30, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, did knowingly and intentionally distribute a controlled substance within 1,000 feet of a school, to wit, approximately 0.9 grams of methamphetamine hydrochloride (commonly known as "ice"), near a high school located in Koblerville, Saipan, in violation of Title 21, United States Code, Section 860(a).

**COUNT SEVEN**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE HYDROCHLORIDE**

On or about November 7, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, unlawfully, willfully and knowingly, possessed with intent to distribute a schedule II controlled substance, to wit, approximately 73 gross (including packaging) grams of methamphetamine hydrochloride (commonly known as "ice"), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT EIGHT**

**ATTEMPTED DISTRIBUTION OF A CONTROLLED SUBSTANCE NEAR A SCHOOL**

On or about November 7, 2007, in the District of the Northern Mariana Islands, LI ZONG GUO, the defendant, did knowingly and intentionally attempt to distribute a controlled substance within 1,000 feet of a school, to wit, approximately 73 gross (including packaging) grams of methamphetamine hydrochloride (commonly known as "ice"), near a high school located in Koblerville, Saipan, in violation of Title 21, United States Code, Section 860(a).

**COMPLAINANT FURTHER STATES:**

1. I, DANIEL G. HOLCOMB, am a Special Agent with the DEA and have been so employed for about eight and one-half years. I am assigned to the DEA's Saipan Post of Duty (Saipan POD), located in the Commonwealth of the Northern Mariana Islands. The following is based on my own investigation or was provided to me by other law enforcement officers who participated in and are familiar with this investigation.

2. On May 8, 2007, at approximately 7:45 a.m., DEA agents and task force officers (TFO's) assigned to the Saipan POD arrested Paul Villanueva ADA on an outstanding Federal arrest warrant issued in the District of the Commonwealth of the Northern Islands (CNMI) for violations of Title 21 USC 841(a)(1): Possession of a Controlled Substance with the Intent to Distribute, and Title 21 USC 846: Conspiracy to Possess a Controlled Substance with the Intent to Distribute. Following his arrest, ADA waived his constitutional rights and provided information regarding other narcotics traffickers in the CNMI.

3. ADA stated that he knew a methamphetamine trafficker, Mr. LI (later identified by officers as the defendant, LI Zong Guo), who distributed methamphetamine on Saipan. ADA stated that he had purchased up to one gram of methamphetamine from LI on several occasions prior to his (ADA's) arrest. ADA stated that he called telephone number (670) 287-1083 to order

1 methamphetamine from LI, and he frequently met LI at the Saipan International School (SIS) in As  
2 Lito, Saipan, to pick up the methamphetamine. ADA then told arresting officers that he was willing  
3 to call LI and order methamphetamine from him.

4 4. On May 8, 2007, at approximately 9:53 a.m., ADA, at the direction of SA Deborah  
5 Muusers and TFO Norman Rasiang, placed a recorded telephone call to LI at telephone number (670)  
6 287-1083. ADA asked LI if he (ADA) could buy "five bucks" (a reference to five grams) of  
7 methamphetamine from LI for \$2000.00. LI told ADA to meet him (LI) at the SIS in ten minutes.

8 5. Officers then established physical and video surveillance at the SIS. At approximately  
9 10:20 a.m., surveillance officers saw a dark green Toyota Tacoma pickup truck driving west towards  
10 the SIS. ADA advised officers that the driver of the Toyota pickup truck was his methamphetamine  
11 source of supply (SOS), LI. Surveillance officers watched LI turn north near SIS and then make a U-  
12 turn in the field northeast of SIS. LI then slowed near SIS, and surveillance officers gave the signal  
13 to take LI into custody. When officers moved to arrest LI, he resisted briefly before being subdued  
14 by officers. A search of LI and his vehicle did not reveal any methamphetamine.

15 6. LI then gave SA Muusers verbal consent to search his residence, located in a barracks  
16 in As Lito, Saipan. During the search of LI's residence, SA Muusers and CNMI Det. Alfred Celes  
17 recovered numerous small ziplock baggies and an empty straw, which based on my training and  
18 experience, are consistent with the materials used to package methamphetamine for further  
19 distribution. SA Muusers and Det. Celes also recovered LI's Chinese passport and several CNMI  
20 seals that appeared to be used for making forged CNMI documents. Officers transported LI to the  
21 Saipan POD, where he was advised of his Miranda warning through a Mandarin language interpreter.  
22 LI refused to sign the Miranda warning, but he advised SA Muusers that he was taking vegetables to  
23 his friend when he turned around in front of the SIS immediately prior to his arrest. Upon  
24 consultation with the United States Attorney's Office, SA Muusers released LI pending further  
25 investigation.

26 7. On October 22, 2007, a CNMI Cooperating Source (CS) provided information to Det.  
27  
28

1 Celes regarding LI's methamphetamine trafficking in Saipan.<sup>1</sup> The CS told Det. Celes that LI was  
2 distributing methamphetamine in Saipan. The CS stated that LI used telephone number (670) 287-  
3 3988 to receive telephonic orders for methamphetamine from his customers. The CS also stated that  
4 LI used to drive a green Toyota pickup truck, but was currently driving a white Nissan sedan.

5 8. On October 25, 2007, at approximately 6:24 p.m., CNMI detectives placed audio  
6 recording equipment on the CS, gave the CS \$200.00 official government funds and instructed the  
7 CS to drive to LI's residence, located on Afetnas Road, in Afetnas, Saipan, and attempt to purchase  
8 methamphetamine from LI. Surveillance officers followed the CS to LI's residence and watched the  
9 CS meet with LI. At approximately 6:37 p.m., CNMI detectives overheard LI tell the CS to wait  
10 while he (LI) obtained the methamphetamine that the CS requested. At approximately 6:39 p.m.,  
11 CNMI detectives watched the CS leave LI's residence, and the CS indicated over the audio recording  
12 device that s/he completed the methamphetamine transaction with LI. Surveillance officers followed  
13 ~~LI~~ <sup>CS (ID#)</sup> to a pre-arranged location, where they recovered approximately 25 gross grams (evidence  
14 packaging included) (approximately 0.8 net grams) of a crushed, glass-like substance from the CS.  
15 When CNMI detectives field-tested the substance, it tested positive for methamphetamine.

16 9. On October 26, 2007, CNMI detectives met with the CS again. At approximately  
17 3:06 p.m., at the direction of Det. Celes, the CS placed a recorded telephone call to LI at telephone  
18 number (670) 287-3398. During the conversation, the CS asked LI deliver \$200.00 of  
19 methamphetamine to the CS. LI told the CS to meet him/her at the Hanam Market, located in  
20 Koblerville, Saipan, which is less than 1000 feet from the Saipan Southern High School (SSHS).  
21 Following the telephone call, CNMI detectives followed the CS, who was again equipped with audio  
22 recording devices, to the Hanam Market.

23 10. At approximately 3:24 p.m., surveillance officers saw LI arrive in the parking lot of  
24 the Hanam Market driving a white Nissan sedan with CNMI license plate ABD-139 (R/O: LI, Zong

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25  
26 1 The CS was arrested by the CNMI Department of Public Safety (DPS) for narcotics violations, and is currently  
27 providing information to law enforcement in exchange for prosecution and sentencing consideration regarding these  
28 charges. The CS has no other criminal history, and to the knowledge of law enforcement officers, the CS has never  
provided false or misleading information.

1 Guo, P.O. Box 419, Koblerville, Saipan, MP) and park next to the CS' vehicle. Surveillance officers  
2 saw the CS get out of his/her vehicle and get into LI's vehicle. At approximately 3:25 p.m.,  
3 surveillance officers watched LI drive across the street with the CS still in his vehicle and park at the  
4 Beauty Salon. Shortly thereafter, surveillance officers watched the CS get out of LI's vehicle and  
5 walk back across the street to his/her vehicle parked in the Hanam Market parking lot. While  
6 watching the CS, surveillance officers overheard the CS state that s/he completed the  
7 methamphetamine transaction with LI. Surveillance officers followed the CS away from the Hanam  
8 Market to a pre-arranged location, where they recovered approximately 24 gross grams (evidence  
9 packaging included)(approximately 0.8 net grams) of a crushed, glass-like substance from the CS.  
10 When CNMI detectives field-tested the substance, it tested positive for methamphetamine.

11 11. On October 30, 2007, Det. Celes met again with the CS. At approximately 8:14 p.m.,  
12 the CS, at the direction of Det. Celes, placed a recorded telephone call to LI at telephone number  
13 (670) 287-3988. During the conversation, the CS ordered \$250.00 of methamphetamine from LI, and  
14 LI directed the CS to meet him at the Hanam Market in Koblerville, Saipan, which is less than 1000  
15 feet from the SSHS. Following the telephone call, surveillance officers followed the CS, who was  
16 again equipped with audio recording devices, to the Hanam Market. When the CS arrived at the  
17 Hanam Market, s/he got out of his/her vehicle and stood next to it in the parking lot.

18 12. At approximately 8:30 p.m., surveillance officers saw LI arrive in a white Nissan  
19 sedan with CNMI license plate ABD-139 and park in the parking lot of the Hanam Market.  
20 Surveillance agents watched the CS walk from his/her vehicle to LI's vehicle and get into the vehicle.  
21 At approximately 8:32 p.m., surveillance officers watched the CS get out of LI's vehicle and walk to  
22 his/her vehicle. Surveillance officers watched LI leave the Hanam Market parking lot, and then  
23 followed the CS to a pre-arranged location. At the pre-arranged location, surveillance officers  
24 recovered approximately 24 gross grams (evidence packaging included) (approximately 0.9 grams) of  
25 a crushed, glass-like substance from the CS. When CNMI detectives field-tested the substance, it  
26 tested positive for methamphetamine.

27 13. On November 6, 2007, the Superior Court for the Commonwealth of the Northern  
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1 Mariana Islands issued a search warrant for LI's residence located on Afetnas Road, Afetnas, Saipan,  
2 and for LI's vehicle, a white Nissan sedan with CNMI license plate ABD-139. On November 7,  
3 2007, the Superior Court for the Commonwealth of the Northern Mariana Islands issued an arrest  
4 warrant for LI for violations of Title 6 Commonwealth of the Mariana Islands Code §2141:  
5 Trafficking of a Controlled Substance, and Title 6 Commonwealth of the Mariana Islands Code  
6 §2142: Possession of a Controlled Substance.

7 14. On November 7, 2007, at approximately 12:36 p.m., the CS met with Det. Celes  
8 again. The CS, at the direction of Det. Celes, placed a recorded telephone call to LI at telephone  
9 number (670) 287-3398. The CS asked LI to deliver \$250.00 of methamphetamine, and LI directed  
10 the CS to meet him in the Hanam Market parking lot in Koblerville, Saipan, which is located less  
11 than 1000 feet from the SSHS.

12 15. After the CS placed this telephone call, CNMI detectives established surveillance of  
13 the Hanam Market. At approximately 12:45 p.m., surveillance officers watched LI arrive in the area  
14 of the Hanam Market driving a white Nissan sedan with CNMI license plate ABD-139. Surveillance  
15 officers watched LI drive slowly past the Hanam Market parking lot and turn down a side street near  
16 the Hanam Market. Surveillance officers then attempted to use their vehicles to block in LI's vehicle  
17 and arrest him. LI then fled from surveillance officers in his vehicle, driving head-on at a vehicle  
18 being operated by CNMI Sgt. Paul Ogumoro. LI then led surveillance officers on a pursuit through  
19 the village of Koblerville. During this pursuit, LI threw three different packages of a crushed, glass-  
20 like substance out of the window of his vehicle while driving down Adobo Road. All of the  
21 packages were recovered by surveillance officers during the pursuit. These packages, which weighed  
22 49 gross grams (evidence packaging included), later field-tested positive for methamphetamine.

23 16. As LI attempted to evade law enforcement officers, he drove in excess of the posted  
24 speed limit, drove in the middle of the roadway in both travel lanes, and drove head-on at the  
25 vehicles being operated by CNMI detectives. On one occasion, CNMI Det. Celes, who was wearing  
26 a black vest with the word "POLICE" on the front and back, exited his vehicle, approached LI's  
27 vehicle and attempted to open the driver's side door of LI's vehicle. When Det. Celes tried to open  
28



1 the door, LI sped away, forcing Det. Celes to jump out of the path of LI's vehicle to avoid being run  
2 down. LI then turned down an unmarked, dead-end dirt road in Koblerville. At the end of the road,  
3 LI jumped out of his vehicle and attempted to run into the jungle. Surveillance officers, all of whom  
4 were wearing vests with the word "POLICE" on the front and back, exited their vehicles and pursued  
5 LI on foot. During the pursuit, CNMI Det. Elias Saralu struck a piece of tin that was attached to a  
6 building at the end of the road, which caused Det. Saralu to sustain a large laceration to his left leg.<sup>2</sup>  
7 Surveillance officers then tackled LI. After a brief struggle, officers subdued and handcuffed LI.  
8 CNMI detectives searched LI immediately following his arrest, and they recovered a silver LG  
9 cellular telephone with telephone number (670) 287-3988.

10 17. CNMI detectives then transported LI and his vehicle to the Saipan POD. At the  
11 Saipan POD, CNMI detectives assisted LI with cleaning the mud off him and provided him with a  
12 change of clothes. CNMI detectives also provided LI with food and water. While waiting for a  
13 Mandarin Chinese interpreter, CNMI detectives searched LI's vehicle pursuant to the CNMI search  
14 warrant. During the search, CNMI Det. Peter Camacho recovered a small zip lock bag with a  
15 crushed, glass-like substance that weighed approximately 24 gross grams (evidence packaging  
16 included) from inside the steering wheel. When CNMI detectives field-tested this substance, it tested  
17 positive for methamphetamine.

18 18. After LI's arrest, CNMI detectives also executed the CNMI search warrant at LI's  
19 residence in Afetnas, Saipan. During the search of LI's residence, CNMI detectives recovered 93  
20 small ziplock bags similar to those used to package the methamphetamine sold to the CS and  
21 recovered during the pursuit of LI. CNMI detectives also recovered two white plastic straws covered  
22 in white, powdery residue. Based on my training and experience, these materials are consistent with  
23 the materials used to package methamphetamine for distribution.

24 19. At approximately 4:25 p.m., DEA contract interpreter Perry Lo read LI his Miranda  
25

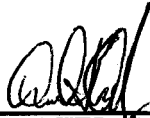
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26 <sup>2</sup> Det. Saralu was transported to the Commonwealth Health Center, where he received thirteen stitches to close the  
27 laceration to his leg.

1 warning in Mandarin Chinese. LI stated that he understood the Miranda warning. LI then signed the  
2 Miranda warning waiver, and he agreed to answer questions.

3 20. LI initially denied that he was in possession of methamphetamine during the vehicle  
4 pursuit. LI then recanted and admitted to possessing the methamphetamine that he threw out of his  
5 vehicle during the pursuit, and he stated that he purchased the methamphetamine from a "local" for  
6 personal use. LI then recanted this statement, and he admitted that he received the methamphetamine  
7 from an unidentified Chinese source of supply. LI stated that he ordered the methamphetamine by  
8 calling telephone number (670) 287-8270. LI stated that after ordering the methamphetamine, he  
9 picked it up at the old airport in Koblerville, Saipan. LI then stated that he planned to sell some of  
10 the methamphetamine that he threw out of his vehicle during the pursuit. LI also admitted that he  
11 was going to sell or give away the methamphetamine that CNMI detectives found in the steering  
12 wheel of LI's vehicle. LI also admitted to selling and "giving" methamphetamine to his friends in  
13 Saipan.

14 21. Following LI's interview, CNMI police officers transported LI to the CNMI  
15 Department of Corrections, where he was booked into custody for multiple violations of CNMI  
16 controlled substance laws.

17  
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19 \_\_\_\_\_  
DANIEL G. HOLCOMB, Special Agent  
Drug Enforcement Administration

20  
21 SUBSCRIBED and SWORN to before me  
22 this ~~12<sup>th</sup>~~ day of December 2007.

23   
24 \_\_\_\_\_  
ALEX R. MUNSON  
25 UNITED STATES DISTRICT JUDGE  
26  
27  
28